

Document owner:	HR-manager UK	Rev no.:	1.1
Approved by:	Chief Executive Officer	Revision date:	03/09/2020
Document status:	Approved	Page number	1 van 1

Anti-Corruption and Bribery policy

It is our policy to conduct all of our business in an honest and ethical manner.

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

However, we remain bound by UK laws, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

It is a criminal offence to offer, promise, give, request, or accept a bribe from any third party.

Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine.

As an employer if we fail to prevent bribery, we can face an unlimited fine, exclusion from tendering for public contracts, and damage to our reputation.

We therefore take our legal responsibilities very seriously.

Third party means any individual or organization one come into contact with during the course of work for Boluda Towage Europe or any of its subsidiaries, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Training on this policy forms part of the induction process for all individuals who work for us.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter

Any person working for us is encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage as per Whistle blowing procedure to manager or appointed responsible person within Boluda Towage Europe .

When any person is unsure about whether a particular act constitutes bribery or corruption, it shall be raised to the appointed person within Boluda Towage Europe in line with the above mentioned procedure.

Geert Vandecappelle
Chief Executive Officer



Boluda Towage Europe
Date: 27-07-2020